

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE**

HARRY HOLT, et al.,)
Plaintiffs,)
vs.)
CITY OF DICKSON, et al.,)
Defendants.)

) No.: 3:07-cv-00727
Judge Haynes

NOTICE OF DEPOSITION UPON WRITTEN QUESTIONS

TO: Beatrice Holt, Bianca Bentley, Bonita Holt, Brandon Holt,
David Brown, Jr., Demetrius Holt, Harry Holt, Jasmine Orsted, O'Brian
Holt, Patrick Holt, Sr., Patrick Holt, Jr. and Sheila Holt-Orsted
c/o George Barrett, Esquire
Barrett, Johnston & Parsley
217 2nd Avenue North
Nashville, TN 37219

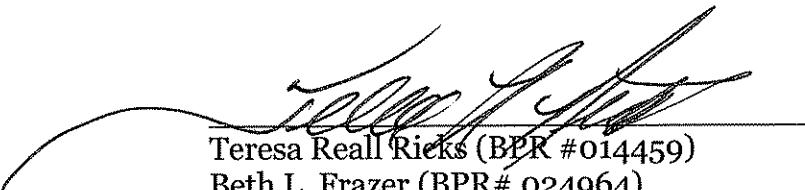
Dickson County
c/o Timothy V. Potter, Esquire
Reynolds, Potter, Ragan & Vandivort, PLC
210 E. College Street
Dickson, TN 37055

Commissioners of TDEC and TDOH
c/o Michael Markham, Esquire
Office of the Attorney General
Civil Litigation & State Services Division
Cordell Hull Building, Second Floor
P.O. Box 20207
Nashville, TN 37202-0207

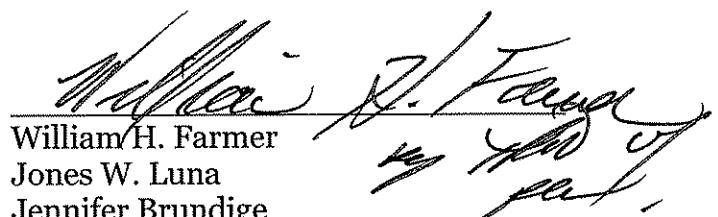
Pursuant to Rule 31 the Federal Rules of Civil Procedure, notice is hereby given
that defendant, City of Dickson, Tennessee, shall take the deposition upon written
questions attached hereto as Exhibit 1 of Ms. Sharon O. Jacobs, attorney at law, Bone

McAllester Norton, Nashville City Center, Suite 1600, 511 Union Street, Nashville, TN 37219. The deposition will take place at the law offices of Bone McAllester Norton, Nashville City Center, Suite 1600, 511 Union Street, Nashville, TN 37219, on July 2, 2009 at 1:00 p.m. It will be recorded by stenographic means by a court reporter from the court reporting firm of Elite Reporting Services, P.O. Box 292382, Nashville, TN 37229. Said deposition shall be taken pursuant to the Tennessee Rules of Civil Procedure and shall be used as discovery, evidence, or any purpose permitted therein.

Respectfully submitted,



Teresa Reall Ricks (BPR #014459)
Beth L. Frazer (BPR# 024964)
Farrar & Bates, L.L.P.
211 Seventh Avenue North, Suite 500
Nashville, TN 37219
(615) 254-3060



William H. Farmer
Jones W. Luna
Jennifer Brundige
Farmer & Luna, PLLC
333 Union Street, Suite 300
Nashville, TN 37201
(615) 254-9146
Attorneys for City of Dickson

Certificate of Service

The undersigned hereby certifies that on this the 17th day of July, 2009, a true and correct copy was sent via electronic mail to:

George Barrett, Esquire
Edmund L. Carey, Jr., Esquire
David W. Garrison, Esquire
Barrett, Johnston & Parsley
217 2nd Avenue North
Nashville, TN 37219

Debo Adegbile, Esquire
Matthew Colangelo, Esquire
ReNika Moore
NAACP Legal Defense Educational
Fund, Inc.
99 Hudson Street, 16th Floor
New York, NY 10013

Lorraine S. McGowen, Esquire
Alyssa Englund, Esquire
Orrick, Herrington & Sutcliffe, LLP
666 Fifth Avenue
New York, NY 10103

Joe R. Whatley, Jr., Esquire
Amy Weaver, Esquire
Joe R. Whatley, Jr., Esquire
Whatley, Drake & Kallas, LLC
P.O. Box 10647
Birmingham, AL 35202-0647
Attorneys for the Plaintiffs

Timothy V. Potter, Esquire
Kirk Vandivort, Esquire
Reynolds, Potter, Ragan & Vandivort, PLC
210 E. College Street
Dickson, TN 37055
Attorneys for Defendant Dickson County

Michael Markham, Esquire
Office of the Attorney General
Civil Litigation & State Services Division
Cordell Hull Building, Second Floor
P.O. Box 20207
Nashville, TN 37202-0207
Attorney for Defendants Commissioners of TDEC and TDOH

Gary A. Davis
Rebecca C. Kaman
Gary A. Davis & Associates
P.O. Box 649
61 North Andrews Avenue
Hot Springs, NC 28743
*Attorneys for the Plaintiffs in case no. 3:08-cv-00321,
consolidated for the purposes of discovery only*



Teresa Reall Ricks